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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

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December 10, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Sault Ste. Marie & McMillan, MI)

MM Docket No. 97-222
RM-9180

COMMENTS AND COUNTERPROPOSAL

1. Now comes Linda K. Graver, President of Black Bear Broadcasting Company of Bay City, Michigan, ("Bear") and makes comments and counterproposes the above.
2. The Commission has released the above-captioned Notice of Proposed Rulemaking in response to a Petition filed by Northern Christian Radio ("Northern").
3. The Commission takes into account that Northern proposes additional non-commercial service to Sault Ste. Marie, Michigan, and that no non-commercial channels are easily available due to the proximity to television channel 6 in Alpena, Michigan, and with Canada which does not recognize the non-commercial band of channels. The Commission undertook its own study and concluded that, indeed, an exception would be appropriate in this case.
4. It was the intention of Bear to file for a Rulemaking to allot channel 272C3 to McMillan, Michigan, as its first broadcast service. To that end, a study was done (copy of which is attached to these comments) which shows that channel 272C3 can be allocated to McMillan absent the allocation at Sault Ste. Marie, Michigan.

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5. To allow for both to have their requests granted, Bear also has studied the commercial band for the area around Sault Ste. Marie, Michigan, and has found that changes in the Canadian Table of Allocations allow for channel 230 to be allocated as a C3 at Sault Ste. Marie, Michigan.
6. The copy of the study, attached, shows that this channel would have previously been excluded from consideration due to an allocation on Manitoulin Island, ONT. However, a check with Canadian DOT confirms that the deletion of this channel on Manitoulin Island has been made and that the allocation no longer exists at that location in Canada.
7. It is therefore possible to allocate channel 230 to Sault Ste. Marie, Michigan, and to allocate channel 272 to McMillan, both as C3 allocations within all of the Rules of the FCC and the U. S. - Canadian Working Agreement as Amended and presently in force.
8. Therefore, Bear requests that the Commission modify its NPRM in this matter as follows to allow for the allocation of channel 230 at Sault Ste. Marie, MI, as requested by Northern and for the addition of a first service to McMillan, MI, as proposed by Bear herein:

Community	Present	As Proposed Under This NPRM
Sault Ste. Marie, MI	252C3, 258C2, 267C1	252C3, 258C2, 267C1, 272C3*
McMillan, MI	None	None
Community	Present	As Proposed By This Counterproposal
Sault Ste. Marie, MI	252C3, 258C2, 267C1	230C3*, 252C3, 258C2, 267C1
McMillan, MI	None	272C3

9. Bear hereby certifies that it has sent a copy of these Comments and Counterproposal to the attorney for Northern by First Class United States Mail, Postage Prepaid on this ninth day of December, 1997.

Jeffrey D. Southmayd
Southmayd & Miller
1220 19th Street, NW, Suite 400
Washington, DC 20036

10. There are two allocation studies attached as exhibits (unnumbered) with these Comments and Counterproposal.
11. Mailing address for Black Bear Broadcasting Co. is:

Linda K. Graver, President
Black Bear Broadcasting Company
2921 Ohio Road
Bay City, Michigan 48706

Respectfully submitted,



Linda K. Graver, President
Black Bear Broadcasting Co.

DAVID C. SCHABERG CONSULTANT
781 S. CHESTNUT REED CITY MI 49677

REFERENCE
46 19 33 N
85 41 16 W

CLASS = C3
Current Spacings
Channel 272 - 102.3 MHz

DISPLAY DATES
DATA
SEARCH 08-25-97

Call	Channel	Location	Dist	Azi	FCC	Margin	
WMKC LI	275C	St. Ignace	MI	104.85	150.7	96.0	8.85
AL272 AL	272B	Marathon	ON	278.03	346.4	223.0	55.03
WAAH.C CP	272C2	Houghton	MI	236.58	292.5	177.0	59.58

REFERENCE
46 22 30 N
84 20 30 W

CLASS = C3
Current Spacings
Channel 230 - 93.9 MHz

DISPLAY DATES
DATA
SEARCH 10-02-97

Call	Channel	Location	Dist	Azi	FCC	Margin	
AL231 AL	231C	Manitoulin Island	ON	165.15	106.6	193.0	-29.85
DE231 DE	231C	Manitoulin Island	ON	165.15	106.6	193.0	-29.85
WNBYFM LI	229A	Newberry	MI	90.25	266.1	89.0	1.25
WAVC LI	230C2	Mio	MI	183.08	180.4	177.0	6.08
AD231 AD	231C1	Little Current	ON	188.42	104.4	181.0	7.42
AL230 AL	230A	Desolation Lake	ON	217.54	349.3	180.0	37.54
WLJZ LI	233C3	Mackinaw City	MI	81.88	196.2	43.0	38.88
WHCM LI	228C2	Boyne City	MI	124.03	199.8	56.0	68.03